

March 16, 2012

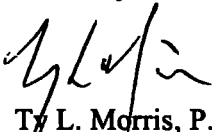
Mr. Jason Gunter
Remedial Project Manager
U.S. Environmental Protection Agency
Region 7 - Superfund Branch
901 North 5th Street
Kansas City, KS 66101

Re: The Doe Run Company – Federal Mine Tailings Site Monthly Progress Report

Dear Mr. Gunter:

As required by Article XVII, Paragraph 73 of the Administrative Order on Consent (Docket No. VII-97-F-0009) for the referenced project and on behalf of The Doe Run Company, the progress report for the period January 1, 2012 through January 31, 2012 is enclosed. If you have any questions or comments, please call me at 573-638-5020 or Mark Nations at 573-518-0800.

Sincerely,



Ty L. Morris, P.E., R.G.
Vice President

TLM/jms
Enclosure

c: Mark Nations – TDRC
Matt Wohl – TDRC (electronic only)
Martin Kator – MDNR - DSP
Kathy Rangen – MDNR - HWP
Adam Nanney – Barr Engineering

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Superfund

Federal Mine Tailings Site
Park Hills, Missouri
Monthly Progress Report
Period: January 1, 2012 – January 31, 2012

1. Actions Performed or Completed This Period:

- a. Work in the Former Chat Pile Area and the Shaw Branch Creek Area was halted so that work could begin in the ORV Riding Area.
- b. In preparation for starting work in the ORV Riding Area, work continued on the task of stockpiling rock onsite. This work is focusing on stockpiling trail rock, Type 1 riprap, Type 2 riprap, and Type 3 riprap. These rock types are being stockpiled in an area to the east of the Shaft Rock Stockpile. As of the end of the period, work on this task had built up a good supply of rock to support the removal action activities in the ORV Riding Area.

It should be noted that a haul road was established from the stockpile area to the ORV Riding Area. This area extends from the Shaft Rock Stockpile to the ORV Riding Area along the ridge that parallels the road from the park entrance to the ORV unloading area. The haul road crosses the road to the ORV unloading area just south of the ORV wash station. This location was approved by MDNR-DSP staff prior to it being constructed.

- c. Work at the site began on the task of constructing the Main Drainage Channel. This work focused on grading the channel and side slopes of the channel between Stations 145+00 and 100+00. As of the end of the period, work on this task had constructed the portion of this channel between Stations 145+00 and 120+00, to within the acceptable tolerances of the final subgrade elevations. This was verified by the surveyors. Work on the portion of the channel between Stations 120+00 and 100+00 had begun but had not progressed very far.
- d. Following the completion of the survey verification in the portion of the Main Drainage Channel between 145+00 and 120+00 work began on the task of covering this portion of the channel with rock. As of the end of the period, work on this task had covered a majority of this portion of the channel with 18 inches of Type 2 riprap.
- e. Work at the site also began on the task of constructing the East ORV Drainage Channel. This work focused on grading the channel and constructing a berm along the south side of the channel between 54+00 and 20+00. As of the end of the period, work on this task had constructed a majority of this portion of the berm. However, this had not been verified by the surveyors. It is anticipated that this verification will take place during the next period.
- f. During the period, Doe Run requested three modifications to the planned removal action activities. These requests are as follows:
 - Shaw Branch Creek Area south between the railroad trestle and the dam - A substantial amount of tailings were left in place to avoid damaging two of the historic buildings. Additional removal action activities in the area would likely cause damage to these buildings. Therefore, it was proposed to grade the remaining mine waste to drain and cover it with rock.
 - ORV Riding Area – The RAWP called for anything that is not currently listed as an approved trail to be covered with soil and vegetated. However, there was concern that if these areas were covered with soil and seed they would resemble trails for quite some time and riders would continue to ride on them causing damage to the cover and vegetation. Therefore, rather than covering these trails with soil, Doe Run requested that they be covered with trail rock. This would provide better protection for these areas as well as be more economical for long-term care and maintenance.

- ORV Riding Area – There are a number of areas where “fingers” of tailings extend into the woods. The RAWP identified that areas “susceptible to erosion” would be covered with rock even if they are flatter than 4H:1V. While these areas do not have a constant flow of water through them, they will be susceptible to erosion from riding activities as well as from periodic drainage coming in from the hillside. Therefore, Doe Run requested that they be allowed to cover these areas with rock. A drawing of “typical” areas where this will occur is included with this progress report.

These requests were reviewed by the EPA project manager and approved.

2. Data and Results Received This Period:

- a. None.

3. Planned Activities for Next Period:

- a. Work will continue on the task of stockpiling trail rock, Type 1 riprap, Type 2 riprap, and Type 3 riprap for use in the ORV Riding Area.
- b. Work will continue on constructing the portion of the Main Drainage Channel between 100+00 and 145+00.
- c. Work will continue on the task of placing rock on the portion of the Main Drainage Channel between 100+00 and 145+00.
- d. Work will continue on the task of constructing the portion of the East ORV Drainage Channel between 54+00 and 20+00.
- e. Work will begin on the task of rocking the portion of the East ORV Drainage Channel between 54+00 and 20+00.
- f. Work will begin on the task of identifying the trails in the southern portion of the ORV Riding Area that are to be closed, left open, or left open and covered.

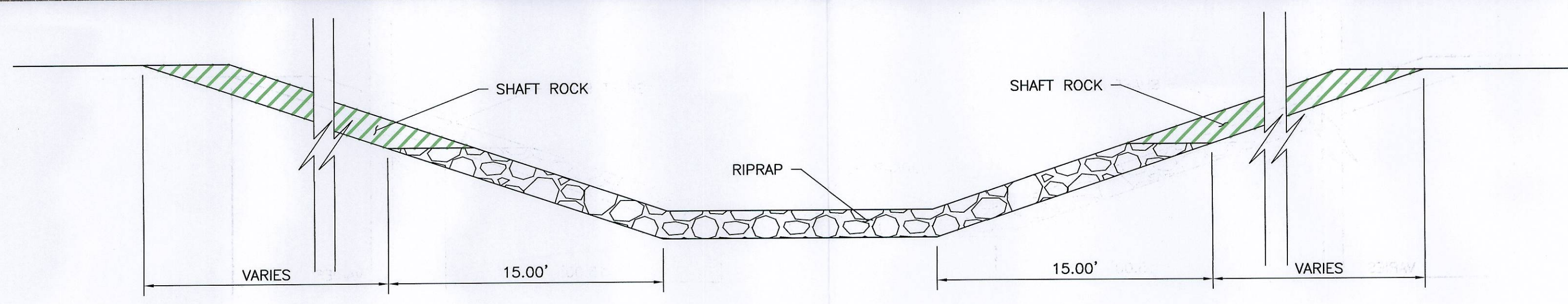
4. Changes in Personnel:

- a. None.

5. Issues or Problems Encountered and the Resolution:

- a. None.

End of Monthly Progress Report



NO.	BY	CHK.	APP.	DATE	REVISION	DESCRIPTION

CLIENT									
BID									
CONSTRUCTION									
EPA									
RELEASED TO/FOR	A	B	C	0	1	2	3		

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Scale	AS SHOWN
Date	3/23/11
Drawn	CMS2
Checked	AJN
Designed	AJN
Approved	TLM

THE
DOE RUN
COMPANY

FEDERAL MINE TAILINGS SITE
PARK HILLS, MISSOURI

TYPICAL SHAFT ROCK LOCATIONS

BARR PROJECT No.	25/86-0006
CLIENT PROJECT No.	
DWG. No.	
REV. No.	